

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, in his official capacity as Governor
of Texas, et al.,

Defendants.

Consolidated Case No. 5:21-CV-
0844-XR

**SUPPLEMENTAL INITIAL DISCLOSURES OF DEFENDANT CLIFFORD TATUM, IN
HER OFFICIAL CAPACITY AS THE HARRIS COUNTY ELECTIONS
ADMINISTRATOR**

Defendant CLIFFORD TATUM, in his Official Capacity as the Harris County Elections Administrator (“Tatum”) now serves his Supplemental Initial Disclosures pursuant to Rule 26, Fed. R. Civ. P., and would respectfully show as follows:

- (1) The names and, if known, the address and telephone number of individuals likely to have discoverable information that may be used to support Defendant’s claims or defenses are as follows:**

As requested by the Court, the witnesses are divided up into Tiers:

Witness Name	Contact Information	Relationship to Case/Subject area of Knowledge	Tier
Clifford Tatum, Harris County Elections Administrator	Contact undersigned counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact of SB 1, as well	1

		as the administration of Harris County	
Jane Nelson, Secretary of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge related to the enactment and implantation of SB 1, as well as the State's general responsibilities in elections.	2
Keith Ingram, Director of Elections, Texas Secretary of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge of the claims and defenses asserted in this lawsuit, and the enactment, interpretation, implementation, and impact of SB 1. This witness oversees responsibilities outlines in Tex. Elec. Code § 31.001(b), § 31.004 for the State, and has knowledge of compliance with and enforcement of State election laws.	1
Warren Kenneth Paxton, Attorney General of Texas	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge of the claims and defense asserted in this lawsuit and enforcement of election laws in Texas, including provisions of SB 1.	2
Jose A. Esparza, Deputy of State	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge related to the administration of election in Texas, and the passage,	2

		implantation, and enforcement of SB1.	
Gregory W. Abbott, Governor of Texas	Office of Attorney General P.O. Box 12548 (MC-009) Austin, Texas 78711 (512) 463-2100	This witness has knowledge related to the passage, implantation, and enforcement of SB 1.	2
Dyana Limon-Mercado Travis County Clerk	5501 Airport Blvd Austin, Texas 78752 c/o Travis County Attorney's Office P.O. Box 1748 Austin, Texas 78767	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact of SB 1, as well as the administration of elections in Travis County.	1
Jonathan White Office of Attorney General	300 W. 15 th Street Austin, Texas 78701 (512) 463-2100	This witness has knowledge related to the passage and enforcement of SB 1.	2
Lupe C. Torres Medina County Elections Office	1300 Avenue M. Hondo, Texas 78861 (830) 741-6009	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact on SB 1, as well as the administration of elections in Medina County	1
Jacquelyn F. Callanen Bexar County Elections Office	101 W. Nueva San Antonio, Texas 78205 (210) 335-2146	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact on SB 1, as well as the administration of	1

		elections in Bexar County	
Yvonne Ramón Hidalgo County District Attorney's Office	100 E. Cano, Hidalgo County Courthouse Annex III, Edinburg, TX 78539 (956) 292-7609	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact on SB 1, as well as the administration of elections in Hidalgo County	1
Michael Scarpello Dallas County District Attorney's Office	500 Elm Street, Suite 6300, Dallas, TX 75202 (214) 653-7358	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact on SB 1, as well as the administration of elections in Dallas County	1
Lisa Wise, El Paso County Elections Department	500 E. San Antonio Ave., El Paso, TX 79901. (915)546-2154	This witness has knowledge of the claims and defenses asserted in this lawsuit, the implantation and impact on SB 1, as well as the administration of elections in El Paso County	1
Cathy Cranston, c/o Disability Rights Texas	2222 W. Braker Lane, Austin, TX 78758. (512) 454- 4816	This witness has knowledge regarding voter assistance and the impact of SB 1 on voter assistance.	1

Nancy Crowther	2102 Lewood Circle, Austin, TX 78745- 3534. (512) 808-7486	This witness has knowledge regarding voter assistance and the impact of SB 1 on voter assistance.	1
LULAC Texas	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
VOTO LATINO	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
Texas Alliance for Retired Americans	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
Texas AFT	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
OCA Greater Houston	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
League of Women Voters of Texas	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1

Revup-Texas	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
Texas Organizing Project	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1
Workers Defense Action Fund	Contact via counsel	This witness has knowledge of the claims and defenses asserted in this lawsuit and the impact of SB 1.	1

- (2) Rule 26(a)(1)(A)(ii): A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

The text and legislative history of SB 1. Clifford Tatum is also in possession of documents related to the administration of elections in Harris County, including documents related to mail-in voting and historical documents related to elections in Harris County. Clifford Tatum will supplement these disclosures as she receives additional documents in the future, such as guidance from the Texas Secretary of State.

- (3) Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Clifford Tatum is not seeking any damages.

- (4) **Rule 26(a)(1)(A)(iv): For inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Clifford Tatum does not have any responsive documents.

Rule 26(a)(2)(C): Expert Testimony

These witnesses are attorneys in the Harris County Attorney's Office and may offer testimony regarding the necessity and reasonableness of attorneys' fees.

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Dated February 24, 2023

Respectfully submitted,

/s/ Sameer S. Birring

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2023, the foregoing document was served via e-mail and efile to all counsel of record.

/s/ Sameer S. Birring